

Federal Defenders
OF NEW YORK, INC.

Southern District
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May 14, 2024

VIA ECF

Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

**Re: United States v. Robert Rumph
23 Cr. 603 (ALC)**

Dear Judge Carter,

I write to respectfully request that the Court adjourn the Rule 12 motions schedule in the above-captioned case for approximately 14 days. The government, by Assistant United States Attorney Will Kinder, consents to this request.

This is the second request for an adjournment. Last month, the Court adjourned the motions deadline because the defense had made additional discovery requests that were relevant to the motions. See Dkt. No. 17. Since then, the government has provided additional materials on a rolling basis (as recently as last week), and we are still reviewing them. In addition, undersigned counsel is currently out of the office sick. The requested adjournment will enable me to complete the motions.

We ask that the Court endorse the following schedule: defense motions due May 28, government responses due June 19, and defense replies due June 26. Depending on the Court's calendar, the parties can still appear at the currently-scheduled July 11 conference, or any subsequent date the Court selects. If the Court adjourns the conference, we consent to the exclusion of time under the Speedy Trial Act.

Thank you for your consideration.

Respectfully submitted,

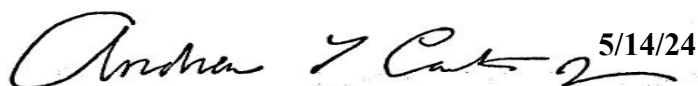
/s/

Sylvie Levine

Attorney for Mr. Rumph

The application is **GRANTED**. Defense motions due: 5/28/24, Responses due: 6/19/24 and Replies due: 6/26/24. The 7/11/24 status conference is adjourned to 8/6/24 at 12:00 p.m. Time excluded from 7/11/24 to 8/6/24 in the interest of justice.

So Ordered.

 5/14/24